

# **EXPLORATION ACTIVITIES SITE AUDIT**

Wonarah Phosphate Project

February 2012

CR 9014\_21\_v2

Exploration Activities Site Audit  
Wonarah Phosphate Project

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## CONTENTS

<b>1.</b>	<b>INTRODUCTION</b>	<b>1</b>
1.1	Background	1
1.2	Audit Requirement	1
<b>2.</b>	<b>AUDIT SCOPE</b>	<b>3</b>
<b>3.</b>	<b>PROTOCOL</b>	<b>4</b>
3.1	Personnel	4
3.2	Timing	4
3.3	Assessment Method	4
3.4	Activities	4
<b>4.</b>	<b>RESULTS</b>	<b>6</b>
4.1	Overview of Findings	6
4.1.1	Compliance and Good Environmental Management	6
	Documentation and Records	6
	General Environmental Management	6
	Minimal Clearance and Disturbance	7
	Rehabilitation	7
4.1.2	Non-compliances	7
	Major	7
	Minor	8
4.2	Audit Assessment Sheet	9
<b>5.</b>	<b>CONCLUSION</b>	<b>10</b>

### Tables

1.1	Exploration activities conducted from February 2008 to January 2011	1
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### Appendices

A	Statement of Auditor Qualifications
B	Environmental Audit Findings Worksheet

# 1. INTRODUCTION

## 1.1 Background

Minemakers Australia Pty Ltd (Minemakers) is investigating the feasibility of developing the Wonarah Phosphate Project (the project), in the Barkly Tablelands of the Northern Territory. As part of these investigations, Minemakers conducts exploration drilling on its exploration and mineral leases at Wonarah. Exploration and mineral leases held by Minemakers at Wonarah are SEL26451, EL26184, EL9979, EL24607, EL26589, EL26584, EL26585 and ML27244. For the purposes of this document only activities associated with exploration have been considered.

Minemakers commenced field exploration in February 2008 and the most recent drilling program was completed in July 2011. A summary of exploration activities conducted over the last three years to January 2011 is provided in Table 1.1.

**Table 1.1 Exploration activities conducted from February 2008 to January 2011**

Activity	Lease					
	SEL26451	SEL26452 (now part ML27244)	EL26185	EL9979	EL24607	EL26589
Number of holes drilled.	19	1468	2	2	12	0
Maximum depth of holes.	70	90	70	70	70	-
Number of drill pads cleared.	19	1390	2	2	12	-
Number of sumps cleared.	0	63	0	0	0	-
Length of line/track cleared (KM: 790 x width 3 m)	209.1	493.6	33.6	7.7	47.0	-
Number of costeans excavated	NA	NA	NA	NA	NA	NA
Total bulk sample pits excavated	NA	NA	NA	NA	NA	NA
Camp areas cleared	NA	NA	NA	NA	NA	NA
Total area disturbed (ha)	63.11	180.96	10.12	2.35	14.34	-
Drill holes capped	19	1460	2	2	12	-
Total area rehabilitated (ha)	15.0	62.96	0.0	0.0	9.0	-

NA: Not applicable.

Source: Exploration Operations Management Plan (Minemakers, 2011). Since this time, additional exploration drilling has been completed.

## 1.2 Audit Requirement

An environmental audit has been undertaken to satisfy requirements specified in the exploration operations management plan (EOMP) and to assess the effectiveness of the environmental management of the project.

The Northern Territory Government Department of Resources (DoR) has approved the EOMP for the exploration activities. The EOMP requires that:

Exploration Activities Site Audit  
Wonarah Phosphate Project

- The EOMP is being properly implemented.
- The EOMP procedures are effective in the environmental management of the project.
- All personnel are inducted and are receiving adequate training.
- Environmental audits are carried out at regular intervals.

## **2. AUDIT SCOPE**

Coffey Environments Australia Pty Ltd (Coffey Environments) was engaged by Minemakers to undertake an independent environmental audit of the exploration operations of the project.

The following criteria were specified for the audit:

- Assessment of compliance with the EOMP.
- Assessment of compliance with government guidelines.
- Consideration of best practice environmental management for mineral exploration activities.

The audit was based on field observations, a review of requested project documents and discussions with staff from Minemakers. The audit attempted to obtain an overview of the level of environmental compliance and management, and identify any system failures relevant to environmental management.

### **3. PROTOCOL**

The following outlines the audit protocol for the audit.

#### **3.1 Personnel**

The Wonarah Environmental Audit team consists of the following Coffey Environments personnel:

Peer Review	Tara Halliday
Auditor	Daniel Moriarty
Author	Daniel Moriarty and Tina Law

A statement of relevant qualifications of Coffey Environments and the auditors is included in Appendix A. Detailed resumes for audit personnel are available upon request.

#### **3.2 Timing**

The audit was conducted on 10 and 11 August 2011.

#### **3.3 Assessment Method**

The audit was carried out in accordance with Section 4.8 of the EOMP.

For each activity during the exploration drilling activities, the extent of compliance was assessed.

The assessment method was based on three possible outcomes:

- Compliance.
- Non-compliant – minor shortfall.
- Non-compliant – major shortfall.

The audit assessment sheet (Section 4.2) is structured to allow the inclusion of comments to explain each assessment, as required.

#### **3.4 Activities**

The structure of the audit was:

- Project office briefing and meeting (visitor's induction) with Minemakers' exploration management personnel.
- Site inspection within the exploration license areas, involving a review of numerous drill sites, sumps and exploration access tracks and gridlines.
- Inspection of project documents.
- Discussion about environmental management with senior management from Minemakers at the site office.

- Close-out briefing.

Representatives of Minemakers accompanying the audit team during its time on site included Russell Fulton and Michael Drummond, and from the Arunga Land Protectors, Paul Slater.



## **4. RESULTS**

### **4.1 Overview of Findings**

As described in Section 3.3, the audit assessment method was based on three possible outcomes:

- Compliance.
- Non-compliance – minor shortfall.
- Non-compliance – major shortfall.

Findings of the audit are summarised below as they relate to compliance and non-compliance.

#### **4.1.1 Compliance and Good Environmental Management**

At the time of this audit, exploration activities and rehabilitation following them at the site were in general compliance with the standard industry practices applied in the Northern Territory and documented in the relevant Department of Resources Advisory Notes. Examples of good environmental management observed are noted below.

##### **Documentation and Records**

The level of environmental awareness and responsibility reflected in project personnel was noted to be high, as reflected in the current standard of environmental management, inductions and housekeeping. Project file documents (e.g., induction register, drill hole rehabilitation log and environmental protocols) were well maintained and adequately addressed the EOMP requirements.

Minemakers expects a similar standard of environmental management from their contractors (particularly drilling contractors), and all contractors must provide Minemakers with a copy of their environmental policies as well as complying with Minemakers' environmental policy and standards at all times.

##### **General Environmental Management**

Minemakers was able to demonstrate that it generally promoted good environmental management of its activities on site, examples include:

- Actively promoting recycling and waste reduction on site e.g., Minemakers gives excess food supplies to the local Wunara community, and conserves consumables by recycling core trays during exploration activity.
- Waste is segregated on site, e.g., tyres, metals, general refuse, to allow for appropriate collection and disposal.
- The general neat and tidy condition of the site.
- All exploration activities were supervised by a Minemakers representative with the authorisation to immediately intervene in practices posing a risk of environmental harm.

## Minimal Clearance and Disturbance

Vegetation clearance was generally kept to the minimum amount necessary to safely complete work. Evidence of this practice was observed at several locations on site and included construction of the drill holes that were generally located in the centre of, or close to the edge of the exploration tracks (Plate 4.1). This ensured that the amount of vegetation removed was kept to a minimum, and generally little more than what was initially carried out during construction of the tracks.

When constructing the exploration tracks, Minemakers advised the contractors to avoid large trees and termite mounds; evidence of this avoidance is shown in Plate 4.2. Tracks were also kept to minimum width, i.e., one vehicle width only, and maintained with minimal or no windrows evident (Plate 4.2). Vegetation, and topsoil where present, had been suitably stockpiled for reuse during rehabilitation activities.

The majority of drill holes were capped immediately after completion and drill sites were left in a very clean and tidy state (Plate 4.3).

## Rehabilitation

It was observed during the site visit that, with the assistance of good rainfall events in the area, many of the completed drill holes and old exploration tracks have naturally revegetated very well (Plates 4.4 and 4.5, 4.6). Indeed, in many instances it was not possible to positively identify historical access tracks, gridlines or rehabilitated drill pads due to the success of rehabilitation in these areas.

Minemakers has also endeavoured to avoid the ongoing use of exploration tracks in areas that are no longer under investigation and this has assisted in the progressive growth of vegetation in these areas.

### 4.1.2 Non-compliances

#### Major

Two major non-compliances, related to the same observation, with the potential to cause environmental harm were recorded and are summarised below:

- All drill holes will be immediately capped upon completion of drilling.

While the majority of the drill holes were capped and rehabilitation commenced and/or completed, some open drill holes were observed in the SEL26451 lease north of the Barkly Highway (Plates 4.7 and 4.8). In one instance, this open hole poses a risk to native fauna, stock and possibly vehicles using the track.

- Hole sealed adequately to prevent the entrapment of fauna.

Some holes have only received temporary capping as there is the potential for these holes to be re-investigated. However, it was noted in some instances that the temporary capping has either been damaged or not used correctly, or been dislodged (Plates 4.9 and 4.10). There is the potential for small mammals and reptiles to crawl into the holes seeking shelter, which could prove to be fatal.

Minemakers is currently engaging with the Arunga Land Protectors to have caps placed on these drill holes to rectify the problem.

## Minor

Five non-compliances were observed that were considered to be of minor significance. These related to the development of an emergency response plan, vehicle wash down procedures, photographic records of drill holes, final rehabilitation of drill holes and weed management. None are considered to constitute a significant breach of the EOMP (refer to Appendix B). Key findings are summarised as follows:

- A formalised environmental emergency response plan.

At the time of the audit, Minemakers had not prepared an environmental emergency response plan. However, during the audit Minemakers committed to the preparation of this document, and its preparation is underway.

- Machinery washed down before bringing to site and on leaving inspect machinery.

Minemakers relies on the word of its contractors regarding the washdown of vehicles and machinery before their arrival on site. A comment was made that vehicles and equipment generally arrives on site in good condition and that contractors are required to wash down vehicles prior to the arrival of vehicles and equipment. However, there is currently no procedure or inspection sheet to ensure that machinery is washed down prior to entering the site, as required by the EOMP. To rectify this, during the audit Minemakers committed to the preparation of this document, and its preparation is underway.

A number of weed species were observed around the site office (Plate 4.11), occasionally on access tracks and particularly at the Arruwurra lay down area (although it is acknowledged that activities in this area are not exploration activities). The implementation of documentation to verify washdown and a procedure for the early identification and management of newly-established weed infestations could prevent further transmission and establishment of weed species within the site.

- Photographic records of drill holes.

For each drill hole 3 photographs will be taken from approximately the same location: after site location but before site preparation; immediately after hole completion and rig egress; and, after final rehabilitation.

During discussions with Minemakers it was noted that while photos were generally being taken of rehabilitated drill holes, there were no records of 'before' and 'immediately after' photos. Minemakers recognises the importance of taking progressive photos to monitor the success and/or failure of rehabilitation efforts and will do so for future exploration activities.

- Within six months of capping, final rehabilitation must have been completed.

While the majority of the drill holes were capped and rehabilitation commenced and/or completed, some holes have only received temporary capping as there is the potential for these holes to be re-investigated. Minemakers has maintained a closure and rehabilitation log for all of their drill holes and are able to determine which holes still require attention. Upon completion of the drilling program Minemakers will cap, cover and rehabilitate the remaining drill holes as per the closure and rehabilitation log.

- Prevent the establishment of weeds.

Several weed species were evident associated with exploration activities. The majority of sightings were at the main camp site (Plate 4.11) and the Arruwurra camp. Minemakers is in the process of contracting a local environmental management group, Arunga Land Protectors, to carry out weed management on site. This is scheduled to take place within the month of August 2011.

As mentioned previously, for future on site activities, Minemakers will implement a machinery wash down and inspection procedure that will assist in the prevention of importing weeds to the site. In addition, cattle activity (tracks and droppings) was observed during the audit. It is possible that cattle are a source of weed transmission around the site.

## **4.2 Audit Assessment Sheet**

Audit assessment findings are presented in Appendix B.

## 5. CONCLUSION

As summarised in Chapter 4, the vast majority of Minemakers' exploration activities at the Wonarah site are in compliance with the EOMP and reflect best practice environmental management. Good environmental management was observed for activities relating to documentation and recording, general environmental management, vegetation clearance practices and rehabilitation.

However, two major and five minor non-compliances were observed. The major non-compliance related to observed drill holes not being capped immediately after completion of drilling or inappropriate and damaged capping and this presents a risk to native fauna by entrapment, in particular. The minor non-compliances related to no emergency response plan, no formalised procedure for the inspection of machinery for weeds and machinery wash down, inadequate photographic records of drill holes, insufficient and/or inappropriate capping and rehabilitation of drill holes and the establishment of weeds on site.

Another audit is likely to be scheduled in 2012 and should verify that the agreed remedial actions in this report have been completed. However, the timing of a follow-up audit is likely to depend upon the intensity of exploration activity over the coming 12 months.

# Plates

**Plate 4.1**

**Drillhole  
located close  
to exploration  
track.**



**Plate 4.2**

**Large tree  
avoided in  
construction  
of exploration  
track.**



**Plate 4.3**

**Capped  
drillhole**



**Plate 4.4**

**Completed  
drill hole  
showing  
evidence of  
revegetation**





**Plate 4.5**

**Disused  
exploration  
track  
(constructed  
in 2008)  
showing  
evidence of  
revegetation**



**Plate 4.6**

**Recently  
constructed  
excavation  
track (for  
comparison  
with Plate  
4.5 above)**



**Plate 4.7**

**Uncapped  
drill hole  
observed  
in  
SEL26451.**



**Plate 4.8  
Uncapped  
drill hole  
observed  
in  
SEL26451.**



**Plate 4.9**

**Damaged cap  
on drill hole.**



**Plate 4.10**  
**Inappropriate**  
**cap on drill**  
**hole.**



**Plate 4.11**

**Weeds evident at  
camp site.**



# Appendix A

## **Statement of Auditor Qualifications**

Coffey Environments' auditing, reviewing and/or due diligence experience extends to over 30 projects in 17 jurisdictions including all Australian states and the Northern Territory, Papua New Guinea, Indonesia, Argentina, Brazil, Chile, Canada, Fiji, Ghana, Haiti, Mexico, Philippines, Norway, and USA. Project experience includes a range of environments and sectors including mining (copper, gold, lead, manganese, uranium and zinc), smelting, petroleum (LNG) and other development projects. The audits, reviews and due diligence investigations have been conducted for a variety of clients, including International Finance Corporation (IFC), Export Finance and Insurance Corporation (EFIC), international banking syndicates, brokers, project operators and potential project purchasers.

Relevant recent examples of project experience in reviews and due diligence include the following:

- **Gold Mine Environmental Audits**, several sites Australia – environmental legal audits of three gold mines across Australia (one in the Northern Territory, and two in Western Australia) in 2009 and 2010. The audit examined compliance with applicable legislation, site standards, corporate standards and environmental risks. The client and project are confidential.
- **Various mine sites**, Australia, Brazil, Canada, Chile, Mexico and USA – Coffey Environments acting as Goldcorp's lead external environmental auditor for operations in the Americas from 2005 to 2009 and in Australia since 1999, completing 19 external environmental audits at 11 operating Goldcorp mines in Australia, Canada, USA, Mexico, Brazil and Chile and three legacy sites in Canada. The audits assessed environmental management; community relations; compliance with corporate policies and international guidelines and long-term liabilities.
- **Stanley Power Project**, PNG – Coffey Environments completed a due diligence assessment for a proposed gas fired power station in the Eastern Highlands of PNG, on behalf of PNG Sustainable Energy Ltd (2008). The reports were prepared for potential lenders.
- **Copper Mine**, NSW – in 2008, Coffey Environments completed an environmental audit and due diligence assessment of a NSW copper mine as required for shareholder approval for its purchase (the client and project are confidential).
- **Caijiaying Zinc Project**, China – In 2007, Coffey Environments completed an external environmental review of the mine focusing on the high-level compliance of the operations with the Equator Principles and the identification of any significant environmental issues (for a confidential client).
- **Martabe Gold Project**, Indonesia – review of the environmental and social aspects of the Martabe Gold Project in 2006 as part of a due diligence assessment for a potential acquisition by Rio Tinto Technical Resources Pty Limited.
- **Mt Muro Gold Project**, Indonesia – an independent technical review of environmental and community aspects of the project in 2011.
- **Cracow Gold Mine**, Queensland – Coffey Environments completed a due diligence assessment and environmental review of the Cracow Gold Mine for AMC Consultants Pty Ltd (2005).
- **Osborne Copper/Gold Mine**, Queensland – in 2004 Coffey Environments assisted Oxiana (now MMG) in preparing a due diligence assessment for the acquisition of the Osborne Copper/Gold Mine.

- **Golden Grove Mine**, Western Australia – in 2004 Coffey Environments assisted Oxiana (now MMG) in preparing a due diligence assessment for the acquisition of the Newmont Golden Grove Operations.



# Appendix B

## **Environmental Audit Findings Work Sheet**

EOMP Compliance Audit  
Womerah Phosphate Project - Exploration Operations

<b>Project:</b>	9014 Minemakers - Wonerah - Exploration operations
<b>Audit Date:</b>	10 August - 11 August 2011
<b>Auditor:</b>	Coffey Environments Dan Moriarty Tina Law

Audit Item Ref. No.	Source			Commitment	Audit Score			Comments
	Dept of Resources - Advisory note	EOMP Jan 2011	EPMGEA Feb 2011		Non-compliant - Major	Non-compliant - Minor	Compliant	
<b>Implementation Strategy/Environmental Management Controls</b>								
<b>General Requirements</b>								
1		Sect 4.1		All drilling contractors, and other contractors that use machinery, have formalised environmental policies and field procedures.			✓	Requirement of all contractors, e.g., Kennedy Drilling Environmental Policy sighted.
2		Sect 4.1		The exploration program will conserve resources, reduce waste and promote recycling.			✓	As far as possible, e.g., excess food provided to local community, core trays are recycled.
3		Sect 4.1		All relevant environmental laws were observed.			✓	No infringements have occurred nor were observed.
4		Sect 4.1		All activities were conducted in compliance with applicable legislation, regulations and licence requirements (as listed in Section 4.2 of the EOMP).			✓	DoR inspection was conducted 27 June - 29 June 2011. No problems advised during visit. MMP letter of acceptance sighted.
5		Sect 4.1		Environmental awareness is actively promoted among Minemakers personnel and contractors.			✓	Environmental awareness promoted in induction. Inductions sighted.
6		Sect 4.1		Regular audits of operations were conducted to ensure performance standards are maintained at the highest level.			✓	Site supervisor on site during exploration and earthworks. Minemakers (MMK) and/or geologist in charge present during all operations activities.
7		Sect 4.1		All management, staff and contractors have received environmental awareness training.			✓	Induction records sighted.
8		Sect 4.1		Minemakers have applied the Australian Minerals Industry Code for Environmental Management to all of their environmental management systems.			✓	MMK Code of Environmental Procedures and Management of Ground-Disturbing Exploration Activities in general compliance.
9		Sect 4.4		The pastoral leaseholder or local manager was consulted before work commenced on SEL26451.			✓	Russell Fulton (RF) called the landholder to advise prior to commencement of drilling.
10		Sect 4.5		All field staff have been inducted with regard to environmental policies. Including: disposal of waste, personal sanitation, camp sanitation, weed awareness.			✓	Induction log and questionnaires sighted. Induction guidelines sighted.

EOMP Compliance Audit  
Womera Phosphate Project - Exploration Operations

Audit Item Ref. No.	Source			Commitment	Audit Score			Comments
	Dept of Resources - Advisory note	EOMP Jan 2011	EPMGEA Feb 2011		Non-compliant - Major	Non-compliant - Minor	Compliant	
11		Sect 4.6		Machinery washed down before bringing to site and on leaving inspect machinery.		✓		No documentation to record this happening. Recommendation made regarding improvement of procedures.
12		Sect 4.7		Contractors are required to have formal procedures for dealing with environmental incidents and emergencies.			✓	Contractors included Welldrilled, Tom Browne Drilling and Kennedy Drilling. Environment Policy of Kennedy Drilling sighted as an example.
13		Sect 4.7		All incidents reported to the site supervisor.			✓	Drilling - example of bird mortality in diamond drill sumps (zebra finches) was correctly reported to DoR in 2009. Document: Risk Management Plan outlines incident reporting procedures. The bulk sampling activity also included an incident register.
14		Sect 4.7		A formalised environmental emergency response plan has been introduced.		✓		Currently in preparation.
15		Sect 4.8		The RC program was monitored by the site supervisor.			✓	Supervisor on site at all times for exploration.
16		Sect 4.6		All machinery bought onto site will be inspected for weeds and washed down before bringing to site and on leaving.		✓		Refer item 11. Reliance on word of contractors and no formal procedure for verification. Documentation in preparation.
17		Sect 6.0		All performance objectives have been met.			✓	Outlined in EOMP.
18			Sect 3.1	All exploration activities were conducted on a granted tenement after submission and acceptance of a PoW.			✓	EOMP outlines PoW. Submitted 3/3/11, approved 31/3/11.
19			Sect 3.1	Evidence the project co-ordinator received from the relevant authorising agency approval to carry out exploration activities.			✓	Letter of authorisation sighted.
20			Sect 3.4	Any significant deviation from the PoW (e.g. additional holes, movement of holes) is discussed with the Project Co-ordinator and written authorisation obtained from DoR.			✓	Additional drilling covered in amendments to EOMP. EOMP approved and authorised.
21			Sect 3.4	Property gates left as found and fences respected (not damaged).			✓	No gates, one fence. No reported incidents of non-compliance.
22			Sect 3.4	Exploration vehicles kept to existing tracks.			✓	No evidence of off-road driving. Reported that off-road driving will lead to punctured tyres.
23			Sect 3.4	No evidence of littering, oil/chemical leakages			✓	Site is generally clean and tidy. Minor refuse observed at Arruwurra camp area but this is not associated with exploration activity and is not a breach of the EOMP.
24			Sect 3.4	All hazardous material disposed off site.			✓	No hazardous material left on site.
25			Sect 3.5	No disturbance to natural water flows, unless specific permission obtained.			✓	No major drainage on site.

**Drill holes**

EOMP Compliance Audit  
Womerah Phosphate Project - Exploration Operations

Audit Item Ref. No.	Source			Commitment	Audit Score			Comments
	Dept of Resources - Advisory note	EOMP Jan 2011	EPMGEA Feb 2011		Non-compliant - Major	Non-compliant - Minor	Compliant	
26			Sect 4.2	All drill holes will be immediately capped upon completion of drilling.	✓			Several instances of uncapped holes were observed in exploration areas to the north of the Barkly Highway. In one instance, large hole remained in the ground that had not been covered nor adequately fenced to prevent intrusion by native fauna or stock.
27			Sect 4.4	For each drill hole 3 photographs will be taken from approximately the same location : after site location but before site preparation; immediately after hole completion and rig egress; and, after final rehabilitation.		✓		Pre-photos not taken. Immediately after photos not taken. Photos after rehabilitation had been taken.
28			Sect 4.4	The following records must be maintained and stored: a copy of each approved PoW complete with accompanying maps, searches and permissions. Drilling summary (dates, times, depths issues) and drill plods.			✓	MMPs. Summaries sighted. Plots sighted.
29		Sect 5.0		Drill holes plugged and buried to 0.3m.			✓	Sighted examples and in general compliance (notwithstanding item 26). Plan to fix any non-conformances.
30		Sect 5.0		Collars to be built up above ground level to allow for subsidence.			✓	Mounded for subsidence.
31		Sect 5.0		Prevent the establishment of weeds.			✓	No evidence of weeds at drill holes. Minor evidence of weeds on a couple of access tracks.
32		Sect 5.0		Hole sealed adequately to prevent the entrapment of fauna.	✓			See item 26 for non-compliance. However, those holes that were plugged (the vast majority) were adequately sealed.
33			Sect 3.7	No unconstrained flow of saline groundwater to impact on natural vegetation or enter a natural watercourse.			✓	None encountered.
34			Sect 3.7	Where unexpected groundwater was intersected, appropriate management measures were implemented ( manual digging of temporary drainage and confinement bunds; extension of existing sumps or creation of temporary overflow sumps; stand-down of the rig and abandonment of the hole).			✓	Occasional instances of intersection of fresh water at base of sand layer. Flow lasts approximately 1 hour and is directed to surrounding vegetation. No evidence of erosion.
35			Sect 4.2	Within 6 months of capping final rehabilitation must have been completed.		✓		Deliberately not done for some drill holes due to potential for more reserve drilling. Will all be completed in one rehabilitation campaign currently in planning.
<b>Drill pads</b>								
36		Sect 5.0		Remove all rubbish , scarify/ reshape where necessary.			✓	Very clean.
37		Sect 5.0		Prepare ground for natural rehabilitation.			✓	Topsoil and cleared vegetation respread where necessary.
38		Sect 5.0		Prevent the establishment of weeds.			✓	No evidence of weeds at drill holes.

EOMP Compliance Audit  
Womerah Phosphate Project - Exploration Operations

Audit Item Ref. No.	Source			Commitment	Audit Score			Comments
	Dept of Resources - Advisory note	EOMP Jan 2011	EPMGEA Feb 2011		Non-compliant - Major	Non-compliant - Minor	Compliant	
39			Sect 3.6	Drill pad constructed as per PoW specifications (20m x 10m).			✓	No evidence of non-compliance. Multiple evidence of considerably smaller drill pads to minimise disturbance sighted.
40			Sect 3.6	Size and quantity of drill pads must be specified in the PoW.			✓	In EOMP.
41			Sect 3.6	Drill pad construction should avoid disturbance to trees or large vegetation. If removal of trees is unavoidable should be specified in the PoW.			✓	Sighted example of avoiding large gum tree.
42			Sect 3.6	Top soil is to be stockpiled separately to facilitate rehabilitation.			✓	Generally not applicable (sandy soils). Where surface soil was present, adequately stockpiled.
43	Exploration drill sites			Drill pad and benches prepared with minimum disturbance and earthworks.			✓	Multiple evidence of minimum clearance required for safe work sighted.
44	Exploration drill sites			Vegetation removal minimised by avoiding large trees and leaving rootstock in the ground to assist with stabilisation and natural regeneration			✓	Multiple evidence of this being done sighted.
45	Exploration drill sites			Minimum area necessary was cleared and levelled, to allow work to be carried out safely.			✓	Multiple evidence of this being done sighted.
46	Exploration drill sites			Unrecoverable dozing of earth and excavated material down steep slopes was avoided.				N/A as no steep slopes.
47	Exploration drill sites			Creation of hard bare rock areas which cannot support vegetation was avoided.			✓	None sighted.
48	Exploration drill sites			If applicable, topsoil was stockpiled the re-spread on completion of the drilling program.			✓	Where present, adequately stockpiled.
49	Exploration drill sites			Excavator was used on steep slopes to minimise earthworks and enable the storage of subsoils and top layer for rehabilitation.				N/A as no steep slopes.
50	Exploration drill sites			Drill holes that were likely to intersect artesian aquifers were pre-collared and had a pressure cement casing of adequate strength and sufficient depth, to enable bore control procedures to be implemented in the event of a blow-out.				NA as no holes likely to intersect artesian aquifers.
51	Exploration drill sites			Site is rehabilitated to as near original condition as possible, following the completion of the drilling program.			✓	Rehabilitation was generally to excellent condition.
52	Exploration drill sites			Compacted ground (as a result of exploration activities) has been ripped along contour, not down slope, to loosed soil to aid revegetation and minimise erosion.			✓	Where required, ground had been ripped.
53	Exploration drill sites			Earth and overburden that was excavated from the pads and benches has been pushed, raked or pulled back over. The stockpiled topsoil and vegetation has been re-spread over the site.			✓	Done in final rehabilitation.
54	Exploration drill sites			All sample bags, waste material and contaminants have been removed from site and disposed of in an appropriate manner, following the completion of the drilling program.			✓	Where drill pads no longer required, sample bags removed and stockpiled at tip for suitable disposal.

EOMP Compliance Audit  
Womerah Phosphate Project - Exploration Operations

Audit Item Ref. No.	Source			Commitment	Audit Score			Comments
	Dept of Resources - Advisory note	EOMP Jan 2011	EPMGEA Feb 2011		Non-compliant - Major	Non-compliant - Minor	Compliant	
55	Exploration drill sites			Drill cuttings that are acidic, radioactive or of substantially different colour to the surface soil have been backfilled in the drill hole. All other cuttings have been dispersed around the site or raked over.			✓	No evidence of non-compliance.
56	Exploration drill sites			Permanent survey markers have been kept to a minimum and wooden pegs used in preference to steel pegs.			✓	Very small steel pegs used. Wooden pegs cannot be used due to fire.
<b>Tracks</b>								
57		Sect 5.0		Prepare ground for natural rehabilitation. Rip and scarify if necessary.			✓	Very good natural regeneration.
58		Sect 5.0		Prevent the establishment of weeds.		✓		Weeds evident along some access tracks and at Arruwurra camp site.
59	Gridlines and tracks			Location of access tracks avoided environmentally sensitive areas and heritage sites.			✓	No encroachment into exclusion zones.
60	Gridlines and tracks			Access track routes minimised tree clearing.			✓	Tracks central with side as required on grid pattern. Evidence of avoiding anthills and large trees.
61	Gridlines and tracks			Blade work was kept to a minimum and where possible the 'blade up' method was used.			✓	No major soil excavations generally required.
62	Gridlines and tracks			Wherever possible vehicles have been driven across unprepared terrain. Following the same wheel tracks each			✓	Cannot drive off tracks.
63	Gridlines and tracks			Width of tracks has been kept to the minimum width safely required to meet the needs of the largest vehicle.			✓	Tracks minimum width only. No unnecessarily-wide tracks sighted.
64	Gridlines and tracks			Natural drainage lines have not been blocked.			✓	No significant drainage lines on the site. No evidence of blocking of minor drainage lines.
65	Gridlines and tracks			Formation of windrows at the sides of tracks has been avoided.			✓	No windrows observed.
<b>Sample bags</b>								
66		Sect 5.0		Bags are stockpiled ready for removal to Tennant Creek in October 2011.			✓	At the tip. Ready for disposal.
<b>Hydrocarbon management</b>								
67			Sect 3.8	Hydrocarbons are stored away from camps, infrastructure and watercourses.			✓	Self-bunded at camp. Earthen bund at Arruwurra.
68			Sect 3.8	Hydrocarbon stores are bunded and/or lined.			✓	60,000 L tank from Ausfuel, self-bunded.
69			Sect 3.8	Hydrocarbon storage areas are safe, cleared of vegetation, maintained and periodically inspected.			✓	Areas clear from fuel load.
70			Sect 3.8	Adequate, appropriate and operational fire extinguishers are available.			✓	All vehicles have extinguishers. Site office has extinguisher. Fuel storage area has extinguisher.
71			Sect 3.8	Re-fuelling activities are conducted in a central facility or precautions are taken to minimise the probability and extent of spillages.			✓	Two locations only.

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72			Sect 3.8	All hydrocarbon spills over 20 litres are reported.			✓	2009 - hydraulic oil spill while drilling.
73			Sect 3.8	Any contaminated soils to be removed to eventual disposal in an approved facility.			✓	Not aware of any incidents or removal since 2010. 2009 incident had soil removed.
74			Sect 3.8	No contaminated materials are to be buried.			✓	Nothing buried.
<b>Bulk sample pit</b>								
75	Costeans and bulk sample pits			Topsoil and subsoil have been stockpiled separately for later rehabilitation, if not required for sampling purposes			✓	Revegetation evident on topsoil. Not on waste rock storage. Some erosion evident.
76	Costeans and bulk sample pits			At least one side of the pit has a slope to allow the escape of native fauna and stock.			✓	Large access/egress ramp from pit.
77	Costeans and bulk sample pits			When rehabilitating the pit should be backfilled as fully as possible with stockpiled subsoil and rock.			✓	No proposal to backfill pit yet under authorisation for bulk sampling activity (separate to EOMP authorisation).
78	Costeans and bulk sample pits			Sides of pit have been battered and re-contoured and stockpiled topsoil respread to aid revegetation.			✓	Battered. Revegetation at top. Otherwise barren.
79	Costeans and bulk sample pits			Drainage structures have established on sloping ground to control erosion, where required.			✓	Drains to pit. Not on waste rock storage, but erosion does not report to drainage lines.